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Attorneys for Defendant Hugh Mo Pro Se,
Defendant Kao Sung Liu i/s/h/a K.S. Liu
Defendant Gina Hiu-Hung Liu i/s/h/a K.S. Gina Hiu-Hung and
Defendant Winston Sie f/i/s/h/a Wilson Xue

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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SANG LAN,	:	
	:	
Plaintiff,	:	Index No.: 11-CV-2870
	:	(LBS)(JCF)
	:	
-against-	:	
	:	
AOL TIME WARNER, INC., THE UNITED STATES	:	
GYMNASTICS FEDERATION d/b/a USA	:	
GYMNASTICS, TIG INSURANCE COMPANY, TIG	:	
SPECIALTY INSURANCE SOLUTIONS,	:	
RIVERSTONE CLAIMS MANAGEMENT, LLC, TED	:	
TURNER, K.S. LIU, GINA LIU AKA K.S. GINA HIU-	:	
HUNG, WINSTON SIE, HUGH MO, JOHN DOES	:	
AND JANE DOES # 1 THROUGH 15, INCLUSIVE,	:	
	:	
Defendants.	:	
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**NOTICE OF DEFENDANTS' MOTION
 TO DISMISS PLAINTIFF'S ACTION
 UPON PLAINTIFF'S SECOND AMENDED COMPLAINT
 PURSUANT TO FED. R. CIV. P. RULE 12(b)(6)**

PLEASE TAKE NOTICE THAT Defendants Kao Sung Liu i/s/h/a K.S. Liu, Gina Hiu-Hung Liu i/s/h/a K.S. Gina Hiu-Hung, Winston Sie, and Defendant *Pro Se* Hugh Mo, ("Defendants"), will move before the Honorable Leonard B. Sand, United States District Judge, at 500 Pearl Street, New York, New York, for an Order granting Defendant's Motion to Dismiss

pursuant to Fed. R. Civ. P. Rule 12(b)(6) for failure to state a claim upon which relief can be granted, awarding Defendants their costs and disbursements, including reasonable attorneys' fees, and such other relief as this Court may deem just and proper.

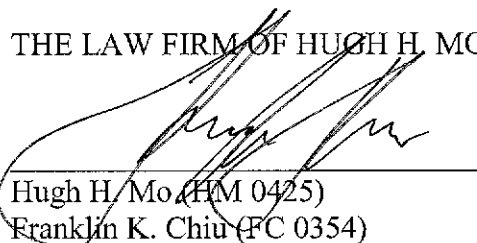
This Motion will be based upon the accompanying Memorandum of Law, the accompanying Declaration of Franklin K. Chiu, Esq., the exhibits annexed thereto, including all pleadings in this matter, and such other additional oral or documentary evidence as may be received prior to or at a hearing on this Motion.

This Motion is based upon several grounds warranting the dismissal of Plaintiff's Action, because Plaintiff's Second Amended Complaint fails to state any claim upon which relief may be granted as set forth in the accompanying Memorandum of Law.

Dated: New York, New York
June 18, 2011

Vincent T. Chang, Esq.
Of Counsel

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